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**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

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**SYNCPOINT IMAGING, LLC**, a Texas  
Limited Liability Company,

Plaintiff,

v.

**NINTENDO OF AMERICA INC.**, a  
Washington Corporation; **NINTENDO CO.,  
LTD**, a Japanese Corporation; **GAME X  
CHANGE, INC.**, an Arkansas Corporation;  
**GAMES2GO**, a business in the Eastern  
District of Texas, and **PIXART IMAGING,  
INC.**, a Taiwanese Corporation,

Defendants

Civil Action No. 2:15-cv-247 –TH-RSP

**(JURY TRIAL DEMANDED)**

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**UNOPPOSED MOTION FOR EXTENSION OF DEADLINES**

Plaintiff SyncPoint Imaging, LLC, (“*SyncPoint*” or “*Plaintiff*”) files this Unopposed Motion for Extension of Deadlines and would show the Court as follows:

Defendants Nintendo of America Inc., Nintendo Co., Ltd. and PixArt Imaging, Inc. (collectively, “Defendants”) filed various Letter Briefs in this matter. The current deadlines for Plaintiff’s Responsive Letter Briefs are December 24, 2015 and December 28, 2015. Plaintiff has requested, and Defendants have agreed to an extension of these deadlines up to and including January 11, 2016. Plaintiff also requests that the deadline for Defendants’ Reply Letter Briefs be extended up to an including January 25, 2016. Good cause exists to make this request. Plaintiff’s lead counsel, Joseph Pia, underwent major surgery on December 15, 2015. At the time of the

surgery, Mr. Pia's doctor believed that Mr. Pia would be able to return to work part-time 15 days after the surgery. However, Mr. Pia's recovery has been more difficult and taken longer than anticipated. Mr. Pia's involvement in the preparation of Plaintiff's opposition to the Defendants' summary judgment letter briefs is critical as he has been extensively, and in some instances solely, involved with all aspects of this case.

To accommodate this extension, and based upon the above recited good cause, the parties further request that the February 8, 2016 date to File Dispositive Motions or Motions to Strike Expert Testimony be changed to February 19, 2016.

Additionally, Plaintiff has agreed to drop its opposition to the Nintendo Defendants' Opposed Motion for Leave to File Letter Brief Requesting Leave To File Motion For Summary Judgment On Grounds That Arose After The Letter-Brief Deadline (Dkt. 212). Further, Plaintiff has agreed that the deadlines discussed above will apply to the associated Letter Brief (Dkt. 212-1), and that Plaintiff will file an opposition to that Letter Brief on or before January 11, 2016. Accordingly, a Revised Proposed Order replacing Dkt. 212-2 is attached.

Dated: December 30, 2015

Respectfully Submitted,

/s/ D. Jeffrey Rambin

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*ATTORNEYS FOR PLAINTIFFS*

**CERTIFICATE OF CONFERENCE**

I hereby certify that counsel for Plaintiff and counsel for Defendants in this case met and conferred regarding the relief requested in this motion, and this motion is unopposed.

/s/ D. Jeffrey Rambin

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on December 30, 2015.

/s/ D. Jeffrey Rambin